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May 7, 2019

**VIA ECF**

Hon. Paul G. Gardephe, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007

Re: *VistaJet US Inc. v. Guilherme Cipriani*, Case No.: 1:18-cv-02853-PGG

Dear Judge Gardephe:

We represent Plaintiff VistaJet US Inc. in the above-referenced matter. I write to provide a status report and to inform Your Honor that the parties' efforts to resolve this matter through mediation have been unsuccessful. As such, I write pursuant to the December 17, 2018 Order Granting [28] Letter Motion for Extension of Time [Dkt. No. 29], to request that the Court issue a Scheduling Order establishing case management deadlines that require the completion of all remaining discovery within three (3) months, or by August 9, 2019.<sup>1</sup>

Accordingly, I propose the following deadlines for an amended Civil Case Management Plan and Scheduling Order:

- Complete fact discovery (¶ 6) depositions of fact witnesses (¶ 7(c)) by June 21, 2019;
- Serve requests to admit no later than June 7, 2019 (¶ 7(d));
- Complete expert discovery no later than August 9, 2019, with party-proponent disclosures by June 28, 2019, and party-opponent disclosures by July 12, 2019 (¶ 8(a)); and
- Parties making post-discovery dispositive motions shall submit a letter to the Court in accordance with Rule 4(A) of the Court's Individual Practices by August 16, 2019; Opposition letters are due August 21, 2019 (¶ 10).

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<sup>1</sup> In light of Plaintiff's counsel's pending motion to withdraw, Dkt. No. 34, I have not conferred with Plaintiff's counsel regarding these proposed dates.

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If this meets with Your Honor's approval, kindly *So Order* this letter.

Thank you for your consideration of this matter.

Very truly yours,

HINCKLEY, ALLEN & SNYDER LLP

*/s/ Christopher V. Fenlon*

Christopher V. Fenlon

cc: Justin Heilig, Esq. (via ECF)  
Mark Changaris (via e-mail)